

Exhibit 4

Layne Hilton

From: Layne Hilton
Sent: Wednesday, December 04, 2019 4:34 PM
To: 'Waleko, Alexandra'
Cc: JMR@pietragallo.com; harkinss@gtlaw.com; Nagle, Brittney <bee.nagle@kirkland.com> (bee.nagle@kirkland.com); JHeinz@c-wlaw.com; Valsartan PEC (valpec@kirtlandpackard.com); Goldberg, Seth A.
Subject: RE: In re Valsartan - Manufacturing RFPDs (follow up meet-and-confer)

Alex:

Plaintiffs believe they complied with the Court's order to show cause in requesting documents pre-dating the Court's discovery cut off timeframes. Indeed, during the parties' November 26, 2019, meet-and-confer, Plaintiffs provided, to Defendants, the examples of the specific API development process and change related manufacturing documents they wanted prior to 2010 (or 2011, as the case may be for Defendant Mylan). Those specific, and discrete, categories of documents are:

- Change request reports and/or analyses regarding any proposed manufacturing change;
- Risk assessments regarding any proposed manufacturing process or change;
- OOS/OOT reports regarding the lab-scale development of the manufacturing process (including any changes); and
- Deviation reports regarding the lab-scale development of the manufacturing process.

Please let Plaintiffs know if the API Manufacturer Defendants will remove their objection to production of any versions of these specific documents that were created prior to 2010/2011. If not, Plaintiffs are prepared to brief the issue.

Best,

Layne

From: Waleko, Alexandra <AWaleko@duanemorris.com>
Sent: Tuesday, December 03, 2019 2:50 PM
To: Layne Hilton <l.hilton@kanner-law.com>
Cc: JMR@pietragallo.com; harkinss@gtlaw.com; Nagle, Brittney <bee.nagle@kirkland.com> (bee.nagle@kirkland.com) <bee.nagle@kirkland.com>; JHeinz@c-wlaw.com; Valsartan PEC (valpec@kirtlandpackard.com) <valpec@kirtlandpackard.com>; Goldberg, Seth A. <SAGoldberg@duanemorris.com>
Subject: RE: In re Valsartan - Manufacturing RFPDs (follow up meet-and-confer)

Layne,

On our November 26 meet and confer related to the manufacturing and regulatory correspondence document requests, the parties discussed three areas of potential dispute. The Manufacturer Defendants' positions on these three issues are provided below.

1. Relevant time period. The Court's November 25 order requires Plaintiffs to make a request for specific documents that predate the relevant time period and show cause why those documents are necessary. However, Plaintiffs have asked again that Defendants expand the relevant time period as to certain of Plaintiffs original document requests. We do not believe this request satisfies the Court's

requirement regarding specificity and cause, especially considering it was subject to the Court's November 25 ruling. Should there be specific documents that you believe satisfy the cause standard, please identify those.

2. Potential nitrosamine contamination. We do not agree with Plaintiffs' contention that the term "potential" in the phrase "potential or actual nitrosamine contamination" in paragraph 6 of the Court's order requires the Manufacturer Defendants to compile a list of every chemical or substance that could lead to or be a precursor to nitrosamine contamination. Rather, it is our view that the term "potential" as used in paragraph 6 refers to regulatory communications about an occurrence or incident that resulted in a potential or actual contamination or to unidentified peaks in tests capable of detecting nitrosamines.

3. Unapproved, tentatively approved, or withdrawn ANDAs. The Manufacturer Defendants do not agree to produce unapproved, tentatively approved, or withdrawn ANDAs for other valsartan products. With few exceptions, the Court's order has limited discovery to products sold in the United States, and these ANDAs necessarily relate to products never sold in the United States. To the extent there is information about nitrosamines or concerns about contamination raised during the approval process for those ANDAs, those documents are captured by other parts of the Court's order. The parties discussed this topic in greater detail on today's meet and confer related to Requests No. 11 to 15.

Regards,
Alex

Alexandra Waleko

Associate

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From: Layne Hilton <I.hilton@kanner-law.com>
Sent: Monday, November 25, 2019 11:28 AM
To: Goldberg, Seth A. <SAGoldberg@duanemorris.com>
Cc: Waleko, Alexandra <AWaleko@duanemorris.com>; JMR@pietragallo.com; harkinss@gtlaw.com; Nagle, Brittney <bee.nagle@kirkland.com> (bee.nagle@kirkland.com) <bee.nagle@kirkland.com>; JHeinz@c-wlaw.com; Valsartan PEC (valpec@kirtlandpackard.com) <valpec@kirtlandpackard.com>
Subject: RE: In re Valsartan - Manufacturing RFPDs (follow up meet-and-confer)

Thanks – I will circulate a dial-in right now

From: Goldberg, Seth A. <SAGoldberg@duanemorris.com>
Sent: Monday, November 25, 2019 10:23 AM
To: Layne Hilton <I.hilton@kanner-law.com>
Cc: Waleko, Alexandra <AWaleko@duanemorris.com>; JMR@pietragallo.com; harkinss@gtlaw.com; Nagle, Brittney

<bee.nagle@kirkland.com> (bee.nagle@kirkland.com) <bee.nagle@kirkland.com>; JHeinz@c-wlaw.com; Valsartan PEC (valpec@kirtlandpackard.com) <valpec@kirtlandpackard.com>

Subject: RE: In re Valsartan - Manufacturing RFPDs (follow up meet-and-confer)

Tuesday at 12 pm works.

Thanks



From: Layne Hilton <l.hilton@kanner-law.com>

Sent: Sunday, November 24, 2019 4:09 PM

To: Goldberg, Seth A. <SAGoldberg@duanemorris.com>

Cc: Waleko, Alexandra <AWaleko@duanemorris.com>; JMR@pietragallo.com; harkinss@gtlaw.com; Nagle, Brittney <bee.nagle@kirkland.com> (bee.nagle@kirkland.com) <bee.nagle@kirkland.com>; JHeinz@c-wlaw.com; Valsartan PEC (valpec@kirtlandpackard.com) <valpec@kirtlandpackard.com>

Subject: RE: In re Valsartan - Manufacturing RFPDs (follow up meet-and-confer)

Hi Seth:

Would Defendants be able to do 12pmET/11amCT on Tuesday? 9:30amET does not work for our team (especially for those on Pacific time), but I believe we have some consensus of people available on our side at 12pmET, if this works for Defendants.

Best,

Layne

From: Goldberg, Seth A. <SAGoldberg@duanemorris.com>

Sent: Friday, November 22, 2019 4:12 PM

To: Layne Hilton <l.hilton@kanner-law.com>

Cc: Waleko, Alexandra <AWaleko@duanemorris.com>; JMR@pietragallo.com; harkinss@gtlaw.com; Nagle, Brittney <bee.nagle@kirkland.com> (bee.nagle@kirkland.com) <bee.nagle@kirkland.com>; JHeinz@c-wlaw.com; Valsartan PEC (valpec@kirtlandpackard.com) <valpec@kirtlandpackard.com>

Subject: Re: In re Valsartan - Manufacturing RFPDs (follow up meet-and-confer)

Hi Layne,

Tuesday at 9:30 works for us. Thanks

Best,
Seth

Seth A. Goldberg
Duane Morris LLP
30 South 17th St.
Phila., PA 19103
215-979-1175
sagoldberg@duanemorris.com

On Nov 22, 2019, at 10:38 AM, Layne Hilton <l.hilton@kanner-law.com> wrote:

Alex, Seth:

Am writing to see if Defendants want to schedule a follow up meet-and-confer on Plaintiffs' manufacturing RFPDs. (Note that I am separating these requests from the testing requests for the time being, as I understand that those requests may be subject to production of certain lists pursuant to the Court's order). However, it seems we made good progress on our last call regarding manufacturing, and it might be beneficial to schedule another call.

I have availability later this afternoon, most of the day Monday (11/25), and possibly early Tuesday morning (11/26), if necessary. Tuesday afternoon I will be leaving the country, but I will be back in the office on Wednesday 12/4.

Let me know what times work for Defendants.

Best,

Layne

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